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COMPANY

INTEROFFICE MEMORANDUM

DATE: October 25, 1999

TO: M. Jennings, K-H, Bldg 130, X2297

FROM: S. M. Nesta, K-H/ESS, T130C, X6386

SUBJECT: NEPA DETERMINATION FOR THE BLDG 374 ACID NEUTRALIZATION PROJECT - SMN-132-99

I have reviewed the project for the neutralization of site contaminated acids at Bldg 374. I understand that the project will include repair of the present neutralizer in Bldg 374, and operation of the neutralizer for the current stockpile of acids and additional acids that will be generated during Site closure operations. About 6,400 gallons of stored acid and up to 3,000 gallons of generated acids will be treated through the process.

With regard to environmental compliance, the project must ensure that all material to be treated will meet Bldg 374 Waste Acceptance Codes, that adequate handling and storage is planned for the sludges to be generated from the process, and that waste generated during repairs of the system are properly managed (e.g., adequate storage for those wastes is available). The project should also consider incorporating pollution prevention measures to reduce waste. The project should prepare a Pollution Prevention (P2)/Waste Minimization Plan that addresses, at a minimum, how to minimize the generation of secondary waste by limiting the amounts and types of additional materials introduced into the process, and maximize packaging efficiency by compaction and size reduction. Further information regarding P2, and a review of the P2 plan, can be directed to Tamar Krantz (X4374). The air quality review indicates that an Air Pollution Emission Notice (APEN) is likely to be required for this project. Additional details about the process are needed to make the determination, and develop the APEN, if needed. Air quality personnel will be meeting with Carrie Wesley, project coordinator, to make the final determination. Questions regarding the air quality review can be directed to Tom Kalivas (X2884). No other compliance issues are noted.

With regard to the NEPA documentation for the project, I recommend that the project be categorically excluded from further NEPA documentation requirements. Attached is a copy of the draft Categorical Exclusion (CX) Determination for the project. Please review the project description portion of the draft CX Determination for accuracy and completeness. Pending any changes you request, this document should be transmitted to RFFO's NEPA Compliance Officer (John Morris) with a request for a final NEPA determination on the project. To maintain tracking of NEPA projects, please copy me on your transmittal to RFFO, at which time we will forward an electronic copy of the CX to Mr. Morris for his use.

- SAFE AND COMPLIANT CLOSURE -

To assist you in properly transmitting the document, a sample transmittal letter from you to the RFFO NEPA Compliance Officer is attached. If changes arise that alter the scope of the project, please contact me so that we can review the changes for NEPA compliance. Please do not hesitate to contact me at X6386 if you have any questions or need additional information.

cc:
Karan North, K-H
Ted Hopkins, RMRS

file

<DATE> 99-RF-XXXX

J. Morris, NEPA Compliance Officer
DOE, RFFO

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENTATION FOR [PROJECT NAME] - YYY-XXX-99

Attached is a draft categorical exclusion for the subject project. Kaiser-Hill NEPA staff recommend that this project be categorically excluded from further NEPA documentation requirements. A draft Categorical Exclusion Determination is included for your review and an electronic copy of the draft Determination has been made available to you.

Please provide a final NEPA determination for this project at your earliest convenience. If you have any questions or need additional information, please contact [PROJECT CONTACT AND EXTENSION].

Name, Director
Division

XXX:xxx

Orig. and 1 cc - J. Morris

Attachments:
As Stated (1)

cc:

S. M. Nesta, K-H

3

DOE NEPA REGULATIONS SUBPART D
CATEGORICAL EXCLUSION (CX) DETERMINATION - RFFO/CX00-99

Proposed Action: Building 374 Acid Neutralization Process.

Location: Rocky Flats Environmental Technology Site, Golden, CO

Proposed by: U.S. Department of Energy Rocky Flats Field Office (DOE, RFFO)

Description of the Proposed Action:

The Rocky Flats Field Office (RFFO) proposes to repair and resume operation of the RCRA-permitted acid neutralization process located in Building 374. The existing equipment has not been operated for an extended period of time and, therefore, repairs must be made to return it to working order. Repairs may include slight modifications to improve the process. Following repairs, the system will be used to neutralize currently stored acids that are pending disposition. The system will also treat acids that will be generated during future Site closure activities. About 6,400 gallons of acid are currently in storage, and up to 3,000 gallons of acids may be generated by future Site activities. Waste acids are anticipated to be generated at a rate of about 500 gallons per year.

The repairs and operation of the neutralization process will also generate sludges and other byproducts. These wastes will be handled in a sludge dewatering process and in accordance with approved storage and disposal methods. The action will continue for the life of Building 374, which is currently scheduled to be demolished in calendar year 2004.

Categorical Exclusion to be Applied:

B6.1 Small-scale, short-term cleanup actions, under RCRA, Atomic Energy Act, or other authorities, less than approximately 5 million dollars in cost and 5 years duration, to reduce risk to human health or the environment from the release or threat of release of a hazardous substance other than high-level radioactive waste and spent nuclear fuel, including treatment (e.g., incineration), recovery, storage, or disposal of wastes at existing facilities currently handling the type of waste involved in the action. These actions include, but are not limited to:

(a) Excavation or consolidation of contaminated soils or materials from drainage channels, retention basins, ponds, and spill areas that are not receiving contaminated surface water or wastewater, if surface water or groundwater would not collect and if such actions would reduce the spread of, or direct contact with, the contamination;

(b) Removal of bulk containers (for example, drums, barrels) that contain or may contain hazardous substances, pollutants, contaminants, CERCLA-excluded petroleum or natural gas products, or hazardous wastes (designated in 40 CFR part 261 or applicable state requirements), if such actions would reduce the likelihood of spillage, leakage, fire, explosion, or exposure to humans, animals, or the food chain;

4

(c) Removal of an underground storage tank including its associated piping and underlying containment systems in compliance with RCRA, subtitle I; 40 CFR part 265, subpart J; and 40 CFR part 280, subparts F and G if such action would reduce the likelihood of spillage, leakage, or the spread of, or direct contact with, contamination;

(d) Repair or replacement of leaking containers;

(e) Capping or other containment of contaminated soils or sludges if the capping or containment would not affect future groundwater remediation and if needed to reduce migration of hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products into soil, groundwater, surface water, or air;

(f) Drainage or closing of man-made surface impoundments if needed to maintain the integrity of the structures;

(g) Confinement or perimeter protection using dikes, trenches, ditches, diversions, or installing underground barriers, if needed to reduce the spread of, or direct contact with, the contamination;

(h) Stabilization, but not expansion, of berms, dikes, impoundments, or caps if needed to maintain integrity of the structures;

(i) Drainage controls (for example, run-off or run-on diversion) if needed to reduce offsite migration of hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum or natural gas products or to prevent precipitation or run-off from other sources from entering the release area from other areas;

(j) Segregation of wastes that may react with one another or form a mixture that could result in adverse environmental impacts;

(k) Use of chemicals and other materials to neutralize the pH of wastes;

(l) Use of chemicals and other materials to retard the spread of the release or to mitigate its effects if the use of such chemicals would reduce the spread of, or direct contact with, the contamination;

(m) Installation and operation of gas ventilation systems in soil to remove methane or petroleum vapors without any toxic or radioactive co-contaminants if appropriate filtration or gas treatment is in place;

(n) Installation of fences, warning signs, or other security or site control precautions if humans or animals have access to the release; and

(o) Provision of an alternative water supply that would not create new water sources if necessary immediately to reduce exposure to contaminated household or industrial use water and continuing until such time as local authorities can satisfy the need for a permanent remedy.

Justification:

The project is a small-scale, short-term cleanup action that will cost about $760,000 for repairs, start-up, and operation. The project will include repair of the existing RCRA-permitted treatment system, which will remain at its current location in Building 374. The system will be operated to neutralize acids (RCRA hazardous wastes) currently held in storage (about 6,400 gallons), as well as those generated during future Site closure activities. An additional 500 gallons of acid per year may be treated by the system. The system will remain active until decommissioning and demolition of Building 374 has begun. Building 374 is scheduled for demolition by calendar year 2004, and the action will therefore be concluded in less than 5 years.

5

The project will reduce risk to human health and the environment from the release or threat of release of a hazardous substances other than high-level radioactive waste and spent nuclear fuel. The treatment (i.e., neutralization) and associated activities (e.g., storage), of the wastes will occur at an existing facility that currently handles contaminated acid wastes. The purpose of the action is to use chemicals and other materials to neutralize the pH of wastes as per B6.1 (k).

In addition, in accordance with 10 CFR 1021.410(b), the project (a) fits within the class of actions listed in Appendix B of Subpart D of 10 CFR 1021, (b) exhibits no extraordinary circumstances that may affect the significance of its environmental effects, and (c) is not "connected" (per 40 CFR 1508.25[a][1]) to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts (per 40 CFR 1508.25[a][2]), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

Further, in accordance with 10 CFR 1021, Subpart D, Appendix B, the project would not (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders, (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; or (4) adversely affect environmentally sensitive resources.

I have determined that the proposed action meets the requirements for a categorical exclusion as defined in Subpart D of 10 CFR 1021. Therefore, I approve the categorical exclusion of the proposed action from further NEPA review and documentation.

Date:_____ Signature: _____

RFFO NEPA Compliance Officer

6/6